

RUMFORD-MEXICO SEWERAGE DISTRICT

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Andrew Fisk
Maine Department of Environmental Protection
Bureau of Land & Water Quality
17 State House Station
Augusta, Maine 04333-0017

Dear Mr. Fisk:

The purpose of this letter is to offer comments on behalf of the Rumford-Mexico Sewerage District relating to the Draft TMDL Report prepared by Paul Mitnik in December 2004.

The report proposes that phosphorus limits for point sources on the Androscoggin be in force from May through September. Starting this in May is a new concept for me. The District has not monitored phosphorus discharges in May so I have no direct data on the quantity of this discharge. I know that during the summer months our discharge was relatively stable except during high flows related to storm events. Since May tends to be wetter than the summer months I have real concerns that the District may not be able to meet the limits in the draft report during May. By proposing these limits be in force in May this could require the municipalities to treat to remove phosphorus, something that probably wouldn't be necessary using a limit of 1.5 times actual discharge during the summer months.

This could be resolved by having a limit in force only from June through September or by using a limit based on 1.5 times the actual discharge including data from May. Another alternative might be to have a seasonal limit rather than a monthly limit. By doing this, wet weather flows would have less impact and we're really concerned with the overall effect for the entire summer rather than one month.

One interesting point that comes out in the TMDL report is what a small impact the municipal dischargers have on the phosphorus levels in Gulf Island Pond. The table below, using discharge data and assimilation factors from the report shows that the municipalities each contribute less than a part per billion of ortho-phosphate phosphorus to the level in the pond. Together the municipalities above the Livermore Falls impoundment contribute less than 0.4 ppb and all the

municipalities together contribute less than 1.3 ppb to the level in Gulf Island Pond.

Ortho-Phosphate Discharge

Town	OPO4-P ppd	Assm Fctr	ppd at GIP	ppb at GIP
Berlin	11.4	1.60%	0.18	0.020
Gorham	7.9	3.90%	0.31	0.034
Bethel	4.5	10.80%	0.49	0.053
Rum-Mex	18	14.90%	2.68	0.292
Liv Falls	8.1	98.40%	7.97	0.869

I think you could make an argument that regulating the municipal dischargers, even to the point of eliminating any discharge of ortho-phosphate, does not do much to improve the water quality in Gulf Island Pond. In fact it would be difficult to measure the change in ambient phosphorus due to such a discharge reduction. I would suggest that at this time regulating municipal phosphorus discharge is not necessary or helpful in improving the Androscoggin River. Moreover, if municipal discharges are not regulated then they could be modeled at their actual discharge levels rather than at the proposed 1.5 times actual levels which might help in reaching a proposal that everyone can live with.

Sincerely,

Gregory E. Trundy
Superintendent